

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

DECLARATION OF RICHARD CIPOLLA

I, Richard Cipolla, am an associate at the law firm of Freedman Normand Friedland LLP,
counsel for Plaintiffs in this case. I hereby declare as follows:

1. I submit this Declaration in support of Plaintiffs' Motion to Compel Production of
Documents responsive to Plaintiffs' First and Second, and a certain portion of the Third Set of
Requests for Production of Documents ("RFPs").

2. The only exceptions to Defendants’ global agreement on the temporal scope of pre-complaint discovery relate to two Defendants that joined the 568 Group relatively recently, and are that: (1) Caltech¹ stated in January that it was “assessing” the burden of producing pre-January 1, 2017 documents related to the formation, development, and purposes of the 568 Presidents’ Group and the Consensus Methodology; and (2) during a February 7, 2023, meet and confer, Samer Musallam, Esq. took the position that JHU will not search for or produce any unstructured data and documents from more than a few years before JHU joined the 568 Group. Mr. Musallam informed Plaintiffs that they would have to seek relief from the Court for any data or documents going back further in time.

3. Dartmouth raised individualized concerns regarding the breadth of documents returned by certain searches based on the otherwise agreed-upon search terms. Plaintiffs conditionally accepted Dartmouth’s revisions pending a review of their productions.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of March, 2023

/s/ Richard Cipolla
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¹ For convenience, Plaintiffs will utilize the abbreviated name for each Defendant used in the Second Amended Complaint, except that the “University of Notre Dame du Lac” will be abbreviated as “ND” and “Johns Hopkins University” will be abbreviated as “JHU”.